



**Isle of Man**  
Government

*Reillys Ellan Vannin*

# **Managing our Natural Wealth to 2020. The Isle of Man's first Biodiversity Strategy**



Grey seals on Kitterland : Calum MacNeil

**Department of Environment, Food and Agriculture**

*Rheynn Chymmltaght, Bee as Eirinys*

**Consultation Summary**

**December 2013**



# 1. Introduction

A consultation was undertaken on the first Isle of Man Biodiversity Strategy between 16<sup>th</sup> July and 30<sup>th</sup> September 2013.

This was done following the extension of the Convention on Biological Diversity (CBD) to the Island in August 2012.

The Strategy will be followed up with a Delivery Plan. Together these will meet the CBD target of having and starting implementing a Biodiversity Strategy and Action Plan by 2015.

The consultation papers are available from the Government's website

<http://www.gov.im/consultations.gov?menuid=16918&type=closed>

This paper summarises the responses received.

## 2. List of respondents

DEFA received 38 responses to this consultation.

Dept of Communities, Culture and Leisure (Curraghs Wildlife park)	4 x 4 Club (4x4)
Dept of Economic Development (DED)	Friends of the Earth (FOE)
Dept of Infrastructure (DOI)	IOM Green Lanes (IOMGL)
Treasury (T)	Isle of Man Antiquarian and Natural History Society (IOMNHAS)
Manx Electricity Authority (MEA)	Isle of Man Fungus Group (IOMFG)
Manx National Heritage (MNH)	Isle of Man Woodland Trust (IOMWT)
Ramsey Town Commissioners (RTC)	Mammal Society (MS)
Lezayre Parish Commissioners (LPC)	Manx Bat Group (MBG)
Water and Sewage Authority (WASA)	Manx Butterfly Conservation (MBC)
	Manx Chough Project (MCP)
Mr Bill Henderson MHK	Manx Farming and Wildlife Advisory Group (FWAG)
	Manx Wildlife Trust (MWT)
11 members of the public	RSPB/Manx Birdlife (MBL)
Manx National Farmers Union (MNFU)	Society for the Preservation of the Manx Countryside (SPMC)
Manx Fish Producers Organisation (MFPO)	University of the Third Age (U3A)

### 3. Summary of responses

Copies of full responses are available from DEFA on request, where permission was given (2 marked were confidential). The main points are summarised below.

7 respondents chose to use the questionnaire. Others sent in full letters from which answers to the questions could be extracted. Many commented on each of the 7 Strategic Objectives. 3 responses largely consisted of suggested re-wording of small sections of text for accuracy.

Government Departments	4
Bodies Associated with Government	5
MHKs	1
Non-Governmental Organisations	17
Individuals	11

References to Strategic Actions in this summary include 2 numbers, the number in the consultation version of the Strategy and the corrected number in brackets afterwards.

#### **Question a)** *Do you agree with the seven strategic objectives in the Isle of Man Biodiversity Strategy?*

20 individuals and organisations answered this question giving explicit support for all the objectives. 5 responses expressed reservations or caveats.

*The Council fully support the principles and objectives of the draft strategy, and that once it is adopted by the Government, the Council comply with it as far as possible.* (Douglas Corporation)

*It is a very positive and thoughtful document but if we have one critical comment (alongside a hundred positive ones) it would be that there are times (e.g. Executive Summary, para. 3) when the biodiversity of the natural world only seems to be valued in terms of its value to the human race, rather than having its own intrinsic value.* (FOE)

*Overall they (Ramsey Commissioners) recognise the importance of the Islands biodiversity and are generally supportive of the policies, however they expressed the need to consider such policies not in isolation but alongside the Islands other policy aims and objectives, such as economic growth, employment and development. The Commissioners in particular felt that the Biodiversity Policy should not be cited as a means of preventing development which might benefit the island or areas of it economically and in support of other policies.* (Ramsey Commissioners)

Only one late response was negative, based on incorrect information about the consultation process (Lezayre Parish Commissioners).

#### **Question b)** *Which objectives do you think are the most important?*

All Objectives are equally important. **5 responses**

*Objective 1 By 2015 at the latest the Government and partners will have commenced implementing an effective Biodiversity Strategy using a Delivery Plan. 5 responses placed this first*

*Objective 4 By 2020 at the latest everyone will understand what biodiversity is, why it is important to our quality of life and will have been empowered to use it more sustainably. 5 responses placed this first and two placed this equal with Objective 5*

*Objective 5 By 2020 at the latest all sites of critical importance for conservation of our biodiversity will be effectively protected and managed so that no resident or migratory wildlife is threatened by human activity. 5 responses ranked this first and two placed it equal with Objective 4*

*"The overriding objective is to take action quickly to at least slow and at best reverse the increasingly rapid loss of biodiversity" (MWT)*

**Question c) Are you in agreement with the strategic actions, especially those which affect you?**

Of the 15 of the 20 responses to this question were wholly positive, including 4 who wished actions to be undertaken sooner or added new actions (suitable for discussion at Delivery Plan stage).

5 organisations said "mostly", adding such comments as

- *"socio-economics should not be ignored" (MFPO),*
- *"We do have some concerns about the potential financial implications of some of the proposed actions on landowners and the potential loss of production whilst there is also a message to produce cheap/affordable food" (MNFU)*
- *"The Department (DED) is unclear as to the scope of action 3<sup>1</sup>". "Regarding action 30<sup>2</sup>, the Department of Economic Development is supportive of a move to a low carbon economy to tackle climate change where we will encourage reduction in energy usage and increase use of renewable energy use." Regarding action 34<sup>3</sup>, it is important that the parameters are clearly defined as to when Environmental Impact Assessments are necessary in order to ensure that small developments continue to be excluded.*
- *"Our issue could be if supporting this strategy affected water quality or if it had to be implemented to the detriment of tenant farmers who had leases" (WASA).*

No responses were wholly negative. Many were wholly positive.

*"I am in complete agreement with them. As a schoolteacher, I would welcome a greater emphasis on biodiversity in schools." (Ravey)*

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<sup>1</sup> **3 (6)** By 2018 comprehensively review all relevant legislation, regulations, schemes, incentives and codes of practice for consistency with biodiversity conservation, especially international obligations.

<sup>2</sup> **30 (33)** By 2020 ensure that no human activities contribute additional stress to vulnerable Island ecosystems already impacted by climate change or ocean acidification.

<sup>3</sup> **34 (38)** By 2016 introduce legislation requiring environmental impact assessments for terrestrial and marine developments and take account of their results.

**Question d)** *Do the associated strategic actions cover all the activities you would like to see undertaken to deliver healthier biodiversity here?*

Of the 19 responses which related to this question 11 (58%) said "yes", 8 (42%) said "no" including one which said it had reservations about one action (Biosphere Reserve). Those saying "no" cited additional areas which they thought should be covered (which will be discussed in relation to the priority tasks in the Delivery Plan);

- Maximising water levels in rivers and streams (by controlling abstraction?)
- Establish a Field Study Centre for biodiversity education and eco-tourism
- Increase broadleaved tree cover
- Recognise potential negative impact of population policies on environment and quality of life
- Protect and conserve network of ancient grass lanes and footpaths
- More actions to conserve biodiversity elsewhere in the world
- More actions to combat climate change and reduce carbon
- More actions to link the strategy with environmentally sustainable development
- Raise awareness of existing biodiversity on farms

**Question e)** *Are there any additional objectives you think should be included? Please tell us your further suggestions.*

Of the 23 responses which related to this question 9 (39%) said "no", 14 (61%) said "yes". Those which said "yes" included the following suggested objectives, (which will be discussed in relation to the priority tasks in the Delivery Plan);

- Continuation of the Wildlife Sites network.
- Identify appropriate population limits to protect our quality of environment (2)
- Halt and reverse habitat fragmentation (2)
- Increase woodland/tree cover and hedgerow trees
- "Sell" island through biodiversity tourism (2)
- Conservation of ancient earthworks and the network of ancient lanes/grass tracks
- "Adopt a track" approach to upland Green Lanes.
- Regular review of objectives and delivery
- Refer to marine operations; offshore wind and aggregates.
- Refer to sustainable economic growth and wealth creation
- Implement remaining regional sewage treatment works
- Reduce carbon footprint and develop Green Economy
- Engage with businesses (financial incentives for businesses which protect biodiversity)

*No, they do not recognise that continued economic development based on indefinite insular population growth is no more compatible with the maintenance of biodiversity than it is with other quality of life concerns. Net population growth due to immigration has been higher here than any comparable first world jurisdiction and has already had major effects on our biodiversity, many irreversible. Now is the time to think about the right balance between population and biodiversity/sustainability. (MS)*

**Question f)** *There may be tasks which you would like to see undertaken as part of the Delivery Plan associated with these actions. Please tell us if you have any suggestions of tasks which we can include in the later Delivery Plan.*

Suggestions include

- Wallaby monitoring and assessment of their impact in Curraghs
- Link assisting biodiversity to rights of tenants in water catchments
- Collect biodiversity information from farmland (2)
- Explain unique biodiversity and risks to it from invasive organisms (pests and diseases) at Ports of Entry.
- Assess displacement of fishing effort in relation to closed areas
- Progress identification for areas requiring protection rather than exhaustive evidence collecting, by applying the Precautionary Principle.
- Assess marine species losses
- Each parish to appoint someone to survey and monitor the condition of ancient lanes, earthen banks, hedges and walls.
- Tree planting projects should be established by all Commissioners/parishes on the island.
- Ensure that biodiversity is included in a comprehensive school syllabus for biology at all levels.
- Establish a Field Study Centre
- Re-introduce sea eagles
- Encourage wildflower diversity (and bees) on un-used land in towns
- Encourage wildlife in gardens
- Prioritise writing Species and Habitat Action Plans

Most of these suggestions can clearly be tied to a Strategic Action and can be discussed in the development of Delivery Plan and priority tasks.

**Question g)** *Which actions could you, and any organisations you are involved in or employed by, contribute to the implementation of the Strategy?*

Manx Birdlife, Manx National Heritage and Manx Wildlife Trust offered continued assistance in a wide variety of ways. Other offers include;

- Monitor bats
- Plant trees
- Publicise the importance of Manx biodiversity here and across (including with older people).
- Promote the study and awareness of biodiversity within our existing programme of activities
- Liaise between farmers and conservationists
- Provide butterfly records, advise on habitat requirements for our butterflies and possibly volunteer assistance for habitat management
- Mammal research oversight
- Advise on monitoring of lanes and footpaths
- Continue to monitor and educate people about marine habitats and continue to work closely with the Fisheries Directorate, MWT and the Marine Conservation Society.

- Increase opportunities for members of the public to access farmland and possibly gather biodiversity data from farmers.
- Use GLUG forum to get biodiversity messages over to green land users.
- By looking at ways of making Isle of Man businesses aware of biodiversity issues
- Investigate "green" tourism business opportunities further; there is the potential for the marketability of the Island to be increased particularly with cyclists, walkers etc.
- Developing Regional Sewage Treatment Strategy
- Lead in biodiversity education for schools and the visiting public at the Wildlife Park
- A programme of public education about the Biodiversity Strategy
- Making MNH premises available for public talks and presentation
- Actions to tackle climate change, trial alternative, greener, electricity generation and assist the public in making energy savings.

**Question h) Do you have views on how the associated work should be resourced?**

5 responses emphasised the need to use all available sources. 2 referred to a funding strategy.

*From a Treasury Department viewpoint (officer) it will be important that an emphasis is placed on identifying economic benefit and collaborative working to cover or share the costs of delivery. Of course, all expenditure, whether newly promoted or ongoing, requires a strong business case (including reliable financial analysis) in support. Financial sustainability is crucial for anything which involves Government investment and although I haven't personally had chance to properly examine the document yet I would, given the above, expect comments to centre on identifying actual benefits to the economy and the cost of compliance (perhaps limiting new investments unless they can at least be seen as cost neutral). More examples of how can DEFA unlock the potential value of this into tangible cashable benefits that we can all enjoy to help the budget re-balancing would be a good way forward. (Treasury)*

*The Isle of Man Government, having signed up to the Convention on Biological Diversity, must ensure that there is sufficient funding made available to meet the objectives in the strategy and fulfil the Aichi goals and targets. (MBL)*

*With the current financial climate Government will find it increasing difficult to finance anything that is not critical and therefore NGO's and volunteer groups will need to be harnessed to assist in all areas. (SPMC)*

Other ideas included

- Offered own members/staff
- Suggested charging users (for biological records)
- Central government funds (existing budgets, make case for additional funds, through Government savings - less verge cutting, local parish funds, green taxes – plastic bags, developers pay for habitat restoration)
- Charities/ NGOs
- Businesses (corporate social responsibility)
- Individuals



- Volunteers and students
- Partnerships

***Question i) Do you have any further comments?***

New points not already mentioned include;

Individuals

- Produce a colourful easily accessible version of the strategy for the general public (aimed at GCSE level students and above).
- Strong and determined government all pulling together to make it work, as it is a long term plan.
- Educating people to care for their environment needs to begin at an early age.
- Great concerns that short term thinking about solving present economic issues may cost our environment in the long term.
- This is an opportunity for the Isle of Man to set forth a distinctive and positive agenda.
- It is important that the benefits of biodiversity are made very clear.
- Concern about contradiction of Government releasing non-natives (Rainbow trout) and planting non-natives (daffodils) into the wild while having an objective for dealing with Invasive Non-native species in the Strategy.

Organisations

- IOMNHAS wholeheartedly supports the ambitious aims of the 'Isle of Man's first Biodiversity Strategy'. This is a bold strategy proposal which, if it is to succeed, will require a very strong leadership from the Department of Environment, Food and Agriculture in order for it to be taken up across all government departments and filter through to the wider community. This will require commitment and resources and will need the support not only of all government departments but also such organisations as our Society. (IOMNHAS)
- The best way to protect biodiversity is to have a vibrant agricultural industry (MNFU).
- Fungi and the benefits they can provide are often overlooked and the Group would like to take the opportunity to highlight these benefits to demonstrate the importance of a Biodiversity Strategy (IOMFG).
- Some actions are postponed for too long and would require to be brought forward to begin to properly implement the strategy, eg 4 (7), 7 (11), 11 (15), 19 (23) and 24 (28) (MBG).
- The success of the strategy will depend on appropriate and adequate funding from whatever source, targeted at those people affected by its implementation (FWAG).
- It is important that any representatives who are going to be part of any Delivery group are recognised post holders from either Government or NGO's (MNFU).
- I firmly believe that this should be partly through the IOM strategic planning system – written in as planning standards to be adhered to, much the same as the planners adhere to other best practice criteria and policies (Mr Henderson MHK).

- Aichi target 11 for objective 5 – the Department is supportive of the targets, especially conserving land managed by Government which does not necessarily have to all be designated ASSI or marine conservation areas (DED).
- We suggest a programme of awareness-raising about the Biodiversity Strategy across the public sector to benefit understanding and embed the principles of biodiversity protection and conservation in decision making process across the Isle of Man Government (MNH).
- We recommend DEFA set up a clear governance and communications framework to aid delivery and implementation of the Strategy; provision should be made to address access to a transparent decision making process, eg membership of, roles and decision making processes of the Biodiversity Oversight Group (MNH).
- Prosecutions and enforcement actions taken for breaches within protected sites could be publicised within local media to act as a deterrent for further degradation. (MEA).
- Consideration might also be given to the establishment of 'corridors' linking high quality/protected sites. (MEA)
- Flora, fauna, trees and wooded areas are important for a healthy biodiversity but the links to all these places is the network of ancient tracks and grass lanes that connect them together. (IOMGL)

## Objectives

This is the revised wording of objectives after comments have been included.

### **The Strategy has seven Strategic Objectives**

1. By 2015 at the latest the Government and partners will have commenced implementing an effective Biodiversity Strategy using a Delivery Plan.
2. By 2020 at the latest Government will lead by ensuring biodiversity is being considered in all relevant areas of policy and decision-making, actively encouraging good practice and adopting all appropriate incentives to support biodiversity.
3. By 2020 at the latest everyone will have access to reliable, up-to-date and comprehensive biodiversity information which is essential to support Government policies and decisions of businesses and private land and sea-users.
4. By 2020 at the latest everyone will understand what biodiversity is, why it is important to our quality of life and will have been empowered to use it more sustainably.
5. By 2020 at the latest all sites of critical importance for conservation of our biodiversity will be effectively protected and managed so that no resident or migratory wildlife is threatened by human activity of any sort. To achieve this we will eliminate loss of essential habitat, significantly reduce habitat degradation and fragmentation and, where appropriate, restore species populations and habitats.
6. By 2020 at the latest Government will monitor, understand and substantially reduce the main pressures on biodiversity, particularly environmental pollution and the prevalence of invasive non-native species and will take measures to meet the biodiversity challenges posed by climate change.
7. By 2020 at the latest the Government will have ensured that controls are in place to guarantee the sustainable management of our land, freshwater and marine resources or have measures in place to

do so, including by means of traditional practices where these are compatible with biodiversity objectives and taking due account of the need to conserve ecosystem services.

**Objective 1.** By 2015 at the latest the Government and partners will have commenced implementing an effective Biodiversity Strategy using a Delivery Plan.

*It is essential that the Strategy and Delivery Plan are sufficiently resourced to enable the Isle of Man Government to demonstrate its commitment to biodiversity and the ecosystem services provided by the natural environment. (IOMFG)*

**DEFA response.** A resourcing strategy will be drawn up.

*The actions do not specify how the Delivery Plan will be developed and whether there will be input from the stakeholders, including the public to that Plan.*

**DEFA response.** Preparation of the Delivery Plan will bring in all interested parties, individuals and organisations.

**Objective 2.** By 2020 at the latest Government will lead by ensuring biodiversity is being considered in all relevant areas of policy and decision-making, actively encouraging good practice and adopting all appropriate incentives to support biodiversity.

Action 2 (5), Biodiversity duty on public servants.

*Duty on "all public bodies to further conservation wherever possible ensuring this is measured and accounted for". Any such changes will require careful consideration to ensure that they are proportionate and do not unnecessarily impede economic growth in the Island. Creating a statutory duty to consider biodiversity will require that guidance be provided to Departments setting out what such a duty would entail. (DED)*

**DEFA response.** DEFA has plans to provide guidance, including through Biodiversity Champions in each department.

*With regard to "adopting further incentives for biodiversity conservation" – in our opinion very few farmers would be against this objective in principle, however there would need to be additional funding similar to the Higher Level Stewardship Schemes offered by other jurisdictions. (MNFU)*

DEFA response. Further discussion about Agri-environment type incentives is required.

*Action 4 (7). By 2020 embed proper consideration of biodiversity and ecosystem services in all relevant policy and decision-making to facilitate Government's commitment to biodiversity - too far in to the future, needs to be brought forward to demonstrate Government's commitment. (MBG)*

**DEFA response.** This will start straight away through Biodiversity Champions.

*The Group welcomes the inclusion of Action 4 (7)<sup>4</sup>....., but this must filter through to the work being carried out on the ground. All too often biodiversity is lost because the person working on the ground is unaware or obtuse to the ecological importance of a site. In many instances biodiversity can be protected when mitigated for and the utilisation of Ecological Methods Statements and 'tool talks' should be promoted. (IOMFG).*

**DEFA response.** We will discuss including this suggestion in the Delivery Plan.

*IOMNHAS supports the proposal to embed biodiversity into government policy and legislation, including the cost implications that this implies. We are pleased to see that this strategy proposes an all-encompassing commitment, not only by government but also through other organisations and individuals throughout the Island's community. (IOMNHAS)*

*It will require a strong and determined government all pulling together to make it work and as it is a long term plan and governments change every 5 years this could make it a lot more difficult. (Shimmin)*

**Objective 3.** By 2020 at the latest everyone will have access to reliable, up-to-date and comprehensive biodiversity information which is essential to support Government policies and decisions of businesses and private land and sea-users.

*Please acknowledge how agriculture and land management through active food production has created a wide range of habitats and contributed massively to the biodiversity of the Isle of Man. There will be cost implications for the data gathering and collation which will be required – is this an affordable option in the current economic climate? (MNFU)*

6 (9). By 2015 identify and fill gaps in biodiversity knowledge – *I can't see that this can be concurrent with above as the BRC needs to be up and running to identify any gaps.*

7(10). By 2020 improve training in ecological research and survey

*This is too far in to the future, needs to be brought forward to assist with the above points*

**DEFA response:** there will be an open discussion about which species and habitats warrant biodiversity action plans. Significance is normally based on lists under international conventions and Red Data Books.

**Objective 4,** By 2020 at the latest everyone will understand what biodiversity is, why it is important to our quality of life and will have been empowered to use it more sustainably.

*We recognise that many NGO's work hard to promote the Island's biodiversity but could there be a greater education and awareness programme delivered through the DEFA wildlife officers. (MNFU)*

*The IOMFG would be willing to work in partnership with the Isle of Man Government to organise educational activities related to fungi and associated ecosystem services. (IOMFG)*

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<sup>4</sup> 4 (7) By 2020 embed proper consideration of biodiversity and ecosystem services in all relevant policy and decision-making to facilitate Government's commitment to biodiversity.

*The Society appreciates that education is the key to improving the awareness of the crucial role that biodiversity plays in our lives. (IOMNHAS)*

*Educating people to care for their environment needs to begin at an early age.(Shimmin)*

**Objective 5** By 2020 at the latest all sites of critical importance for conservation of our biodiversity will be effectively protected and managed so that no resident or migratory wildlife is threatened by human activity of any sort. To achieve this we will eliminate loss of essential habitat, significantly reduce habitat degradation and fragmentation and, where appropriate, restore species populations and habitats.

*This objective could have serious implications for agriculture depending on how this objective is to be achieved. The aim to "minimise loss of habitats, significantly reduce habitat degradation and fragmentation" is already governed by the conditions of the Countryside Care Scheme with significant penalties if a recipient breaches the regulations. What are the implications of "for Government to effectively protect and manage the most important sites for biodiversity ...." – does this imply that additional conditions and regulation may be imposed on land owners – a clearer definition of how this objective may be achieved is required. (MNFU)*

**DEFA response:** Delivery plan with include more details of priority tasks.

*Action 14 (18) - we are concerned about headlining the percentage designation coverage. Content can be more important than quantity. This is addressed in the phrase "ecologically representative" but we would prefer that the point is made more explicitly in the wording. Equally the land/sea which is included in the 17%/10% protected areas needs to be carefully assessed to ensure the area actually is suitable for area based management and that it is being 'effectively managed'. Land/sea should not just be classed as 'protected' to reach the figures. Recognition that not all marine protected areas should be designated for fisheries management/stock enhancement, but that areas specifically for conservation of habitats & species (including migratory species) also need to be implemented.*

*Action 14 (18) - Similarly, there needs to be appropriate monitoring of areas to ensure they are in a favourable condition or being restored.*

*Action 16 (20)– A statistically valid sample survey of the phase 1 data set would achieve the same goals "to understand rates of habitat loss, and help prioritise habitat and species conservation" as a whole survey.*

**DEFA response;** all options for assessing habitat change are being considered. *Survey changed to assessment.*

*Action 17 (21)– While we fully support landscape scale conservation we do not see the value in a statutory designation. It's suggested that the word "initiative" should replace "designation".*

**DEFA response;** suggestion adopted, *designation* changed to *initiative*.

*More emphasis should be placed on identifying all known locally extinct species, and studies made into their possible reintroduction. David Bellamy*

*Conserving habitats and species is crucial to this strategy but the Society is also concerned by the impact of development on the Manx landscape. We regularly respond to planning issues and Strategic Plans and will endeavour to continue to provide comments where developments are likely to affect the historical, cultural and, in particular, the natural landscapes of the Island. The 'urbanisation' of properties through the wider countryside is likely to have a long term impact on biodiversity and is an area of concern to us. IOMNHAS*

*Objective 5 is commendable but further work needs to be done to support landowners in delivering and maintenance of habitats that through generations they have helped to create and maintain. We feel FWAG has an important role to play in this area. FWAG*

*The IOMFG broadly welcomes the inclusion of this objective. However, if there was a way of facilitating the rapid designation of sites then this should be undertaken. In addition many sites in the Isle of Man meet the criteria for International designation as Special Areas of Conservation (SAC) and Special Protection Areas (SPA). These areas should be identified and given the same level of ecological consideration and weighting as they are in the UK. Consideration should be given to designating sites for their fungi interest once their abundance and distribution is better understood. IOMFG*

**Objective 6.** By 2020 at the latest Government will monitor, understand and substantially reduce the main pressures on biodiversity, particularly environmental pollution and the prevalence of invasive non-native species and will take measures to meet the biodiversity challenges posed by climate change.

*We agree that it is important to achieve this objective. We do have concerns that the introduction of invasive non-native species such as Himalayan balsam and Japanese Knotweed by third parties are resulting in significant costs being imposed on landowners both private and Government – particularly in relation to their removal. Whilst recognising the impracticalities of monitoring all imports, there should at the very least be a hugely increased awareness/education programme highlighting the dangers of importing to the Island – second hand bee keeping equipment (possible importation of the varroa mite) for example. (MNFU)*

*The only caveat I have is in Objective 6 which states "the main pressures on biodiversity, particularly pollution and invasive non-native species". Whilst non-native species can cause tremendous damage, they are hardly as great a pressure as development. Also, it should be recognised that some non-native species - such as Red Valerian or Buddleia - are of more use than harm to local wildlife. (Ravey)*

**DEFA response :** levels of risk will be assessed. DEFA recognises development pressure and works with government under Objective 2 to address this.

*More emphasis should be placed on recording and eradicating invasive non-native species. (Bellamy)*

*There is an urgent need to address action 28 (32)(non-native species strategy) which must be led by government departments. In line with this objective and objective 4 – education, there needs to be a policy of education at the ports/airports where the public are departing for the island about not bringing plants, animals or other materials which could be vectors for transmission of disease to the island. (FWAG)*

*Action 28 (32)– an invasive species strategy should be formed and implemented, but it should be noted that many non-natives are not damaging. They may well prove to be beneficial and add to ecosystem robustness in the face of climate change and other threats to keystone species (e.g. sycamore). This could be achieved by clarifying invasive non-natives as "potentially ecologically damaging non-natives". (MWT)*

**DEFA response;** It is planned to look at existing risk assessments and use the recognised definition on invasive non-native species. Education will form part of the invasive non-native species strategy

**Objective 7.** By 2020 the Government will have ensured that controls are in place to guarantee the sustainable management of our land, freshwater and marine resources or have measures in place to do so, including by means of traditional practices where these are compatible with biodiversity objectives and taking due account of the need to conserve ecosystem services.

*Much of what I have outlined hereinbefore translates into the actions of a number of user groups who have clearly let it be known of their willingness and ability to give back their efforts and help to protect the environment to ensure that future use is sustainable, again, a clear pre-requisite of the Strategy. (4x4 club)*

*Government has also invested c. £500m in natural gas infrastructure and the substantial remaining debt must be funded without an excessive burden falling on the MEA, gas tariff payers or on taxpayers. The potential to export renewable energy to the Island's neighbouring jurisdictions offers the best of both worlds: we can aid efforts to reduce carbon emission while generating an economic and fiscal return for the Isle of Man. DED believes these efforts should be the focus. (DED).*

*Objective 7 – the Manx NFU acknowledges and agrees with the objective of sustainable management and use of our land, and the need to work with our existing ecosystem services. There is however a conflicting message to producers of the need to produce cheap food for an ever increasing population at a competitive cost whilst also working with for example, small fields, a multitude of hedges etc to encourage and retain biodiversity. If agriculture on the Isle of Man becomes completely unviable or hamstrung by constraints adding to the existing diseconomies of scale, there will not be a sustainable agricultural sector to care for the countryside and future biodiversity. From March 2014 there will be no support for the retention and management of land which is currently being managed under the Agri-Environment Scheme. The economic pressures on agriculture at the current time may lead to a reduction in the amount of habitat being specifically managed for wildlife without the support offered by the AES. The use of traditional practises generally leads to reduced agricultural production and the economics of not achieving maximum production is something that will be seriously challenged when both agricultural support and returns from the market place are reducing. (MNFU)*

*Action 34 (38)– legislation requiring EIAs - This should be a priority (MWT).*

*Action 38 (8)– Fisheries and Agri environment incentives which support traditional practices... This should be a priority. (MWT)*

**DEFA response;** Action 38 moved to 8.

*The IOMFG considers the inclusion of all the actions associated with this objective necessary for the fulfilment objective. As sustainable practices are developed they should be adopted as quickly as possible. The IOMFG recommends the inclusion of an Aim for the Government to implement newly developed sustainable practices as rapidly as possible and to stay abreast of current research.* (IOMFG)

*Agriculture is a constantly evolving industry which requires farmers to produce food commercially and with a global food shortage 'imminent', farmers have a responsibility to produce food in a sustainable economically viable way whilst also preserving the appearance of the countryside and the island's biodiversity. We recognise in attempting to encourage traditional or what are now current management practises in the future, that there may be a need for additional support schemes.* (FWAG)

*Action 34 (38) From our professional viewpoint whilst we would obviously welcome the requirement for EIAs we would also like to see incentives for developers to include measures for not only conservation but also positive enhancement of biodiversity. Environmental conditions and mitigation measures forming part of a planning approval also need to be monitored to check for implementation.* (Prescott)

**General Comments.** The term "by 2020" has been misunderstood by several consultees as "not until 2020 or around that time". Addition of "at the latest" should emphasise the need to act well before 2020.

## 4. Results

The details of the consultation responses are being considered by DEFA and the Biodiversity Strategy Drafting Committee. They are considering which changes need to be made as a result of the consultation. Many have been adopted in the new draft. Other submissions, where they were factual corrections to biology and research, or revisions of grammar, have also been noted.

## 5. Time frame

Changes to the Strategy will be considered by DEFA and the Strategy Drafting Committee and a final version laid before Tynwald in early 2014. Following this a Delivery Plan will be drawn up of the top priority tasks to deliver effective biodiversity conservation by 2020.